

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

DISABILITY RIGHTS TEXAS, §  
§  
Plaintiff, §  
§  
vs. § CIVIL ACTION NO: 5:19-cv-01162-XR  
§  
ROBERT ARIZPE, in his official capacity §  
as the Superintendent of San Antonio §  
State Hospital, §  
§  
Defendant. §

**PARTIES' JOINT MOTION TO EXTEND THE DISCOVERY DEADLINE**

The Parties respectfully move to extend the current discovery deadline from September 25, 2020 to October 9, 2020, and in support would show:

The Court's March 11, 2019 Scheduling Order (Doc. #14) set September 25, 2020 as the deadline for the completion of all discovery. Due to agreed extensions to discovery responses and the willingness to mediate this case, the Parties request an additional fourteen days to complete discovery.

Plaintiff submitted its Request for Interrogatories and Production to Defendant on July 10, 2020. On August 10, 2020, Defendant requested a two-week extension to August 31, 2020 to respond to Plaintiff's discovery requests. The Parties agreed to the extension with the understanding that the Parties would file a joint motion to extend the discovery deadline if Plaintiff needed additional time to complete its discovery.

On September 2, Plaintiff noticed Defendant for a 30(b)(6) deposition to be held on September 16. Prior to the deposition, the Parties discussed the possibility of mediation and the desire to postpone the deposition until after mediation. Mediation is currently scheduled for October 1, 2020, and if needed, Defendant's deposition will be scheduled the following week.

The Parties are therefore now jointly requesting a fourteen (14) day extension of the discovery deadline, with a new deadline of Friday, October 9, 2020.

The requested extension of time will not affect any other timelines in the Scheduling Order, including the deadline for pre-trial motions set for October 26, 2020.

The Parties do not move for this extension for the purpose of delay, but rather in the interests of justice and judicial economy.

Therefore, based on the above, the Parties respectfully move this Court to extend the September 25, 2020 discovery deadline to October 9, 2020.

Respectfully submitted,

/s/ Beth Mitchell  
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ATTORNEYS FOR DEFENDANT

## **CERTIFICATE OF CONFERENCE**

I hereby certify that on September 23, 2020, I conferred with counsel for Defendant, who stated that Defendant agrees to join this motion.

/s/ Beth Mitchell  
BETH MITCHELL

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 2020, a true and correct copy of the foregoing document was electronically filed using the Court's CM/ECF filing system, thus providing notice of electronic filing to the following:

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/s/ Beth Mitchell  
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